

**ARCELIK-LG KLIMA SANAYI VE TICARET
A.S. PERSONAL DATA PROTECTION AND
PROCESSING
POLICY**

07/10/2016

ARÇELİK-LG KLİMA SANAYİ VE TİCARET A.Ş.
PERSONAL DATA PROTECTION
AND PROCESSING
DATA SHEET

Document Name

ARÇELİK-LG KLİMA Sanayi Ve Ticaret A.Ş. Personal Data Protection and Processing Policy

Target Audience:

All individuals and natural persons other than the employees of ARCELİK-LG KLİMA Sanayi ve Ticaret A.S. whose personal data are processed by ARCELİK-LG KLİMA Sanayi ve Ticaret A.S.

Prepared by

ARCELİK-LG KLİMA Sanayi ve Ticaret A.Ş. Personal Data Protection Committee consisting of members selected from the Legal Counselling, Information Technologies and Human Resources departments.

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Approved by:

Top Level Management of ARCELİK-LG KLİMA Sanayi ve Ticaret A.Ş

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In case of any dispute between Turkish version of the Policy (the original language) and any translation text, Turkish version should prevail.

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1. SECTION 1 – INTRODUCTION

1.1. INTRODUCTION

Personal data protection is among the top priorities of our Company. The most critical phase of this matter is the protection and process of personal data of our customers, potential customers, employee candidates, corporate shareholders, corporate officers, our visitors, employees, shareholders and officers of our business partners as well as third parties. This protection and process shall be fully governed pursuant to this Policy. Our Company's activities and operations to protect personal data of our employees are governed in ARCELİK-LG KLİMA Sanayi ve Ticaret A.Ş. Policy for Protection and Process of Employee Personal Data which was drafted and issued in line with the principles set out herein.

According to Turkish Republic Constitution, everyone is entitled to demand that his personal data should be protected. As for the protection of personal data which is a Constitutional right, our Company shows due care and diligence as a Corporate policy for the protection of personal data of our customers, potential customers, employee candidates, corporate shareholders, corporate officers, our visitors, employees, shareholders and officers of our business partners as well as third parties pursuant hereto.

Accordingly, our Company duly adopts administrative and technical measures necessary for the protection of personal data processed in line with the applicable law.

This Policy offers detailed explanations for basic principles listed below and embraced by our Company for the process of personal data.

- Processing personal data in line with the law and rules of integrity;
- Keeping correct personal data and updating them;
- Processing personal data for specific, clear and legitimate purpose;
- Processing personal data in a restricted and prudent/ proportional manner solely for the intended purpose;
- Keeping personal data for such term as permitted in the applicable legislation or for the intended purpose for their process;
- Disclosures and information to the personal data owners;
- Setting up such necessary system to exercise the rights of personal data owners;
- Adopting necessary measures to keep personal data;
- Acting in line with the applicable legislation and the Personal Data Protection Committee regulations for the transfer of personal data to third parties as may be necessary for their process;
- Showing due and diligent care to the protection and process of special categories of personal data (sensitive data).

1.2. PURPOSE OF THE POLICY

The basic purpose of this Policy is to clarify, describe and explain such systems that we have adopted to carry out operations for the protection and process of personal data in line with the applicable law; and accordingly, to ensure transparency by giving due information to those persons whose personal data are processed by us, including, mainly, our customers, potential customers, employee candidates, corporate shareholders, corporate officers, our visitors, employees, shareholders and officers of our business partners as well as third parties.

1.3. SCOPE

This Policy concerns all personal data of our customers, potential customers, employee candidates, corporate shareholders, corporate officers, our visitors, employees, shareholders and officers of our business partners as well as third parties that are processed automatically or by other means which must be a part of any data recording/logger system.

As for the groups of personal data owners in the above-mentioned categories, this Policy may be applied in its entirety (for instance, our Active customers who are also our visitors) or partly (only for our Visitors).

1.4. IMPLEMENTATION OF THE POLICY AND APPLICABLE LAW

Applicable statutory regulations which are currently in force as for the processing and protection of personal data shall prevail. In case of a conflict between the applicable law and this Policy, our Company accepts that the applicable law shall prevail.

The Policy is actually an adaptation of the rules set out in the applicable law in light of our Company's policies and procedures. Our Company duly implements its systems and carries out its preparations in order to ensure compliance with such effectiveness terms as set out in the PDP Law. (Please see ANNEX 3)

1.5. EFFECTIVENESS OF THE POLICY

This Policy drafted by our Company is dated 07.10.2016. In case the entire Policy or specific articles of it are reworded or replaced, the date of this Policy shall be updated.

Our Policy shall be posted / published at our Company's web site; <https://www.arcelik-ig.com.tr> and shall be made available to the access of relevant persons upon the request of personal data owners.

2. SECTION 2 - PERSONAL DATA PROTECTION

Our Company has adopted necessary technical and administrative measures, and necessary audits are carried out by or on behalf of us, in line with Article 12 of the PDP Law to prevent the unlawful process of personal data processed by us, to prevent unauthorized access to such data and to secure appropriate security level to safeguard the data.

2.1. SECURITY OF PERSONAL DATA

Our Company shows utmost care and diligence, and duly adopts legal, technical and administrative measures necessary for the data security in the following areas: Actions and measures adopted by our Company to ensure “data security” pursuant to Article 12 of the PDP Law:

- Our Company adopts technical and administrative measures in order to ensure the lawful process of personal data depending on technical means and implementation costs. Employees are duly informed, and necessary letters of undertaking are received from them whereby they undertake, that they may not disclose personal data that they come to know to third parties in breach of the PDP Law nor may they use them for any purpose other than the intended one, and that this obligation shall survive and remain applicable following their resignation.
- Our Company takes technical and administrative measures depending on the nature of the data to be protected, technological means and implementation costs in order to prevent the inadvertent or unauthorized access to, disclosure or transfer of personal data or any otherwise unlawful access to them in breach of law.
- Our Company enhances the awareness of its business partners and suppliers to whom personal data are disclosed for their process to prevent unlawful process of such personal data, to block unauthorized access to them and to ensure lawful keeping and safeguarding of such data.
- Our Company's obligations that it should comply with during its process of personal data in its capacity as the data controller as well as its further obligation to act in line with such legal, administrative and technical measures developed by it in this respect are also strictly required and asked from data processing entities with which our Company is in interaction such as our Company's suppliers, business partners etc by means of relevant contracts with them and in a manner in harmony with the nature of their operations underlying the data process.
- Our Company duly takes necessary technical and administrative measures in order to ensure the safekeeping of personal data in safe environments and to prevent their destruction, loss or modification for unlawful purposes depending on technological means and implementation costs.
- Necessary audits are carried out by or on behalf of our Company at its own organization in line with Article 12 of the PDP Law. Results of such audit are reported to such relevant department under the internal functioning of the Company and necessary actions are taken to improve measures adopted by us.

- Our Company implements a system whereby in the event that data processed in line with Article 12 of the PDP Law are unlawfully disclosed to third parties, this shall be reported to the relevant personal data owner and the PDP Committee as soon as possible.

2.2. RESPECT TO THE RIGHTS OF DATA OWNER; CREATION OF CHANNELS THROUGH WHICH THESE RIGHTS SHALL BE COMMUNICATED TO US AND EVALUATION OF REQUESTS FROM DATA OWNERS

Our Company implements and conducts necessary channels, internal functions and administrative and technical regulations in line with Article 13 of the PDP Law so as to evaluate the rights of personal data owners and to provide personal data owners with necessary information.

In case personal data owners communicates their requests in relation to their rights listed below to our Company in writing, our Company finalizes the request as soon as possible but at the latest within thirty days free of charge based on the nature of the request: Notwithstanding the foregoing, in case this requires an additional cost, such fee set out in the tariff to be determined by the PDP Committee shall be charged by our Company. Personal data owners shall have the following rights:

- To be informed if their personal data are processed;
- To ask information about the process if their data are processed;
- To get informed about the purpose underlying the process of their personal data, and whether such data are used in line with the intended purpose;
- To know about third parties to whom personal data are transferred in Turkey or abroad;
- Where personal data are misprocessed or underprocessed, to ask for their correction and to make sure that the correction should be reported to third parties to whom personal data are transferred;
- To demand that personal data which have been processed in line with the PDP Law and other applicable legislation should be deleted or destroyed because those reasons requiring its process are no more applicable and that the resultant destruction or deletion should be notified to third parties to whom such data are transferred;
- To object to any result or outcome that is totally against the personal data owner upon an analysis of such data exclusively by means of automatic systems;
- To demand for the compensation of his losses in case he suffers a loss due to the unlawful processing of his personal data.

Pursuant to the first paragraph of Article 13 of the Personal Data Protection Law, you are required to communicate your request to exercise your rights above to our Company in writing or by other methods designated by the Personal Data Protection Committee. As the Personal Data Protection Committee has not determined any method at this point, you are required to communicate your application to us in writing pursuant to the mandatory provisions of the Law.

In order to exercise your rights above, you are required to send your request along with such data necessary to verify your identity and your explanations for the right you would like to exercise, describing your right as set out in Article 11 of the Law. This way your application will be replied more quickly and effectively.

In line with this, below are such channels and procedures of our Company that you may send your application in writing in case you want to exercise your rights in Article 11 of the Personal Data Protection Law on the basis of Article 13 thereof:

In order to communicate your request to exercise your rights set out in Article 11 of the PDP Law, you are required to complete the form that can be downloaded from <https://www.arcelik-lg.com.tr>, and may deliver a signed version of completed form personally or send it via notary public or by means of other methods described in the PDP Law to the address of Gebze Organize Sanayi Bölgesi İhsan Dede Cad. No:139, 41480, Gebze - KOCAELİ, or may send it to the address of "arceliklgklima@hs02.kep.tr" online and with secure electronic signature in accompaniment of documents necessary to confirm and verify your identity, provided that you should also make explanations and clarifications about the exercise of such right therein.

2.3. PROTECTION OF SPECIAL CATEGORIES OF PERSONAL DATA (SENSITIVE DATA)

The PDP Law attributes a special importance and emphasis to certain personal data because if they are unlawfully processed, they may cause the owner to aggrieve or may result in discrimination.

Such data include information about race, ethnical origin, political beliefs, philosophical beliefs, religion and faith, sects or other beliefs, clothing and attire, membership to foundations, unions or societies, health, sex life, criminal conviction and sentence, security measures as well as biometric and genetic data.

Our Company acts diligently and with great care in order to protect these sensitive personal data that are categorized as "special categories" in the PDP Law and that are duly processed in line with the law. In this respect, technical and administrative measures adopted by our Company for the protection of personal data are diligently implemented for the special categories of such personal data and necessary audits are carried out.

2.4. DISCLOSURE AND INFORMATION TO PERSONAL DATA OWNERS

Our Company makes disclosures and explanations to the personal data owners during the collection of their personal data in line with Article 10 of the PDP Law. Accordingly, our Company makes following disclosures and explanations to personal data owners during the collection of their personal data: our Company's identity, the purpose underlying the process of personal data, potential transfer of processed personal data to which parties and for what purpose, methods and legal reasons for collecting personal data and rights that the owner is entitled to under Article 11 of the PDP Law.

According to Article 20 of the Constitution, everyone is entitled to be informed about his personal data. In line with the foregoing, “the right to request information” is also listed among the rights of the personal data owner as described in Article 11 of the PDP Law. Our Company provides necessary information upon the request of the personal data owner in line with Article 20 of the Constitution and Article 11 of the PDP Law.

In addition, by virtue of various publicly accessible documents, including, mainly, the present Policy, our Company discloses to personal data owners and concerned parties that it processes personal data in line with the PDP Law and, essentially, in line with “the Law and Good Faith” so that our Company secures accountability and transparency in this respect. Moreover, our Company provides relevant people with information by means of many different methods about its own operations and the legal regulation including, mainly, circumstances that our Company seeks the explicit consent of the data owners.

3. SECTION 3- PERSONAL DATA PROCESS

Our Company processes personal data in a restricted and prudent way for right, current, specific, clear and legitimate purposes and in line with the law and good faith pursuant to the Article 20 of the Constitution and Article 4 of the PDP Law. Our Company keeps and stores personal data for such duration as set out in the applicable law or as may be required due to the purpose of personal data process.

Our Company processes personal data on the basis of one or several conditions set out in Article 5 of the PDP Law applicable to their process in line with Article 20 of the Constitution and Article 5 of the PDP Law.

Our Company acts in line with such regulations applicable to the process of special categories of personal data in line with Article 6 of the PDP Law.

Our Company acts in line with the regulations introduced by the PDP Committee and set out in the applicable law for the transfer of personal data in line with Articles 8 and 9 of the PDP Law.

3.1. PROCESS OF PERSONAL DATA IN LINE WITH THE PRINCIPLES SET OUT IN THE APPLICABLE LAW

3.1.1. Processing in line with the Law and the Good Faith

Our Company acts in line with the rule of general trust, confidence and good faith as well as principles introduced by legal regulations for the process of personal data. Accordingly, our Company gives due consideration to the proportionality requirements in the process of personal data, and does not use such data beyond their intended purpose.

3.1.2. Ensuring that Personal Data are correct and, where necessary, current and updated

Our Company ensures that personal data processed by it are correct, current and updated by giving due consideration to the fundamental rights of personal data owners and its own legitimate interests. It takes necessary measures in this respect.

3.1.3. Process of Personal Data for specific, clear and legitimate purposes

Our Company sets and defines its purpose to process personal data in a clear, unambiguous and conclusive manner in line with legitimate and legal principles. Our Company processes such personal data in relation to the services offered by it and to the extent required for them. Our Company lays down and defines the purposes underlying the process of personal data even before starting to process them.

3.1.4. Related to the purpose underlying the process, restricted and proportional/prudent process

Our Company processes personal data in a manner that facilitates the performance of the intended purpose and avoids the process of personal data which are not relevant to the purpose or which are not needed. For instance, it does not process personal data to meet possible needs in future.

3.1.5. Keeping and Storing Personal Data for such duration as set out in the Applicable Law or for such term as may be required for the purpose underlying their process

Our Company keeps and stores personal data for such duration as set out in the applicable law or as may be required due to the purpose of personal data process. Accordingly, our Company first finds out if any term is set and defined in the applicable law for the storage of personal data; where a term is set, it acts in line with that term; unless a term is set, it stores personal data for such duration required by the purpose underlying the process. When the term expires or reasons requiring the process are no more applicable, personal data are deleted, destructed or anonymized by the Company.

3.2. PROCESS OF PERSONAL DATA ON THE BASIS OF ONE OR SEVERAL PERSONAL DATA PROCESS CONDITIONS AS SET OUT IN ARTICLE 5 OF THE PDP LAW AND PROCESS IN A MANNER RESTRICTED BY THESE CONDITIONS

Protection of personal data is a constitutional right. Fundamental rights and freedoms may be restricted by means of laws only and on the basis of reasons set out in relevant articles of the Constitution without tampering with their essence. Pursuant to third paragraph of Article 20 of the Constitution, personal data may be only processed in such circumstances set out in the applicable law or upon the explicit consent of the owner. Our Company processes personal data only in such circumstances set out in the applicable law or upon the explicit consent of the owner in this line and in accordance with the Constitution.

Explicit consent of the personal data owner is only one of legal grounds that render the process of personal data possible in line with the applicable law. Apart from the explicit consent, personal data may be processed in case either of other conditions below exists. Basis for processing personal data may be only one of the conditions below or more than several such conditions may underlie the same personal data process activity. Where processed data are in special category (sensitive data), following conditions shall be applicable.

While legal basis underlying our Company's process of personal data may vary, our Company strictly acts in line with general principles set out in Article 4 of the Law no 6698 for any and all personal data process operations (please see Section 3.1).

(i) Explicit Consent of Personal Data Owner

One of the conditions to process personal data is explicit reason of their owner. Explicit consent of the personal data owner should be specific to a certain case, based on an informed decision and with his free will.

In order to process personal data subject to explicit consent of their owner, explicit consents of potential customers or visitors are obtained via applicable methods.

(ii) Explicit permission in the applicable law

One's personal data may be processed in line with the applicable law only if it is explicitly permitted therein.

(iii) Failure to Obtain Explicit Consent of the Owner due to Actual Impossibility

Even in case of a person who may not give his explicit consent due to actual impossibility or whose consent may not be accepted as valid and applicable, his personal data may be processed in case it is strictly required to process them to maintain and keep his or someone else's life secure or physical body intact.

EXAMPLE Where a customer faints, his friends disclose his blood type to doctors.

(iv) Directly related to the execution or performance of the contract

Provided that it should be directly related to the execution or performance of the contract, it is possible to process personal data of contractual parties in case it is strictly necessary.

(v) Fulfilment by the Company of its Legal Liabilities

Where, in its capacity as the data controller, our Company needs to process one's personal data to fulfil its legal liabilities, such data may be processed.

(vi) Publicity by the Personal Data Owner

In case the personal data owner publicizes his data, such personal data may be processed.

(vii) Mandatory Process of Personal Data to Assert, Establish or Protect a Right

Where it is imperative to process data to assert, establish or protect a right, one's personal data shall be processed.

(viii) Mandatory Process for Legitimate Interests of our Company

Provided not to prejudice to the fundamental rights and freedoms of the personal data owner, his personal data shall be processed in case such process is mandatory for legitimate interests of the Company.

3.3. PROCESS OF SPECIAL CATEGORIES OF PERSONAL DATA (SENSITIVE DATA)

Our Company acts diligently and with care in line such provisions of the PDP Law for the process of such personal data which are, according to the PDP Law, special categories.

According to Article 6 of the PDP Law, certain personal data which, in case of unlawful process, may cause prejudice or risk to its owner or may cause discrimination are called as “data of special categories (sensitive data).” Such data include information about race, ethnical origin, political beliefs, philosophical beliefs, religion and faith, sects or other beliefs, clothing and attire, membership to foundations, unions or societies, health, sex life, criminal conviction and sentence, security measures as well as biometric and genetic data.

Sensitive data are processed by our Company in line with the PDP Law in the following circumstances, provided that sufficient measures required by the PDP Committee shall be taken:

- If the explicit consent of personal data owner exists;
- If the explicit consent of personal data owner does not exist;
 - For such sensitive data other than the health and sex life of the personal data owner, such circumstances described in the law.
 - Sensitive personal data of the personal data owner in connection with his health and sex life may be processed by only such persons bound by the confidentiality obligation or competent authorities or entities with the intention to protect public health, to provide preventive medicine, medical diagnosis, treatment and care services as well as to plan and manage healthcare service financing.

3.4. TRANSFER OF PERSONAL DATA

Our Company may transfer personal data and sensitive personal data to third parties (third party companies, group companies, third party individuals) by taking necessary security measures and in line with its personal data process purposes which are legitimate and lawful. Our Company acts in line with such provisions in Article 8 of the PDP Law in this respect.

(i) Transfer of Personal Data abroad

Our Company may transfer personal data and sensitive personal data to third parties by taking necessary security measures and in line with its personal data process purposes which are legitimate and lawful. Our Company transfers personal data to foreign countries only which are declared by the PDP Committee to provide an adequate level of data protection (“Foreign Country with An Adequate Level of Data Protection”), or where adequate level of data protection is missing, to such foreign country for which data controllers in Turkey and in that country guarantee an adequate level of

protection in writing and which is among the countries permitted by the PDP Committee ("Foreign Country where data controller guaranteeing an Adequate Level of Protection is based"). Our Company acts in line with the provisions set out in Article 9 of the PDP Law in this respect.

3.5. PROCESS OPERATIONS AT BUILDING AND FACILITY ENTRANCES OR INSIDE THE BUILDING AND FACILITIES AND WEB SITE VISITORS

Personal data process operations take place at our Company buildings and facilities by monitoring access and exit of customers by surveillance with security cameras in order to ensure security.

Our Company conducts and carries out personal data process by using security cameras and by noting down the visitor access and exit times.

Accordingly, our Company acts in line with the Constitution, the PDP Law and other applicable legislation in this respect.

Images of our visitors are recorded by way of surveillance and monitoring through cameras at the entrances of our Company buildings and inside them.

With the surveillance by security cameras, our Company is intended to enhance the quality of the services offered, to ensure reliability, to secure the security and safety of the Company, customers and other persons and to safeguard the interests of customers in services received by them.

Our Company acts in line with the provisions of the PDP Law in connection with surveillance operations via security cameras for the security purposes.

Camera surveillance operations carried out by our Company are in line with the Law on Private Security services and other applicable law.

Only a limited number of Company employees have access to the records taken and stored in digital media. Live camera shoots may be viewed by the security officers that we hire from third parties. Such limited number of people with access to records undertake by means of a confidentiality obligation letter, to keep the confidentiality of such data they have access to.

In line with Article 12 of the PDP Law, our Company takes necessary technical and administrative measures to ensure the security of personal data derived from the camera surveillance operations.

In addition to camera image recording activities, our Company carries out personal data process for monitoring access and exit by visitors at our Company's buildings and facilities in order to ensure security and achieve purposes set out herein.

3.6. CONDITIONS TO DELETE, DESTROY AND ANONYMIZE PERSONAL DATA

As per the provisions of Article 138 of Turkish Criminal Code and Article 7 of the PDP Law, in case reasons underlying the process of personal data which are processed in line with the applicable law are no longer applicable, such personal data shall be deleted, destroyed or anonymized at our Company's sole discretion or upon the request of the personal data owner.

In this respect, our Company shall take necessary technical and administrative measures internally to fulfil it such obligation as it has developed such necessary functional mechanism in this respect; it also trains relevant business units and makes assignments and raises their awareness in order to ensure compliance with such obligation.

Personal data owners visiting our Company's premises are clarified and given information in this respect when their names and surnames are asked and recorded, or such information may be given by means of bulletins posted at the Company's premises or otherwise made available to the access of visitors. Data obtained to control visitor access and exist are processed only for this purpose and relevant personal data are recorded with the data recording system in physical medium.

In order to ensure the security and to fulfil purposes defined herein, our visitors may be give access to Internet upon his request for the duration of his stay in our Buildings and Facilities. In this case, log records about your access to Internet shall be recorded pursuant to the mandatory provisions of the Law no 5651 and the provisions of this Law; these records are only processed upon the request by authorized public authorities and institutions or in case our Company needs to fulfil its legal obligation in audit processes at our Company.

Only limited number of employees have access to these logs recorded this way. Company employees with access to these records shall have access to these records and share them with legally authorized people only upon the request from the authorized public entities or institutions or for their use in the audits. Such limited number of people with access to records undertake by means of a confidentiality obligation letter, to keep the confidentiality of such data they have access to.

At our Company's web sites, accesses by the visitors and their movements inside the site are logged in order to ensure that their visit are in compliance with their intended purpose; to offer them customized contents and to make online

advertisements. Such logging is made by technical means (for instance cookies).

Detailed explanations about the protection and process of personal data logged during these visits are available in “Web Site Confidentiality Policy” document at the relevant web sites.

4. SECTION 4- MISCELLANEOUS

4.1. RELATION OF THE COMPANY’S PERSONAL DATA PROTECTION AND PROCESS POLICY WITH OTHER POLICIES

The Company ensures that these terms and conditions set out in this Policy are duly enforced and applied inside the Company by virtue of such policies, procedures and implementation guidelines. Policies, procedures and implementation guidelines applicable to the protection of personal data shall be related and linked to basic policies, procedures and implementation guidelines applied by the Company in other areas so as to ensue harmony between different policies and processes of the Company with similar purposes.

4.2. GOVERNANCE STRUCTURE FOR THE COMPANY’S PERSONAL DATA PROTECTION AND PROCESS POLICY

A “Personal Data Protection Committee” has been set up in the Company pursuant to a decision by the top level management for the administration and management of this Policy and other related policies, procedures and implementation guidelines. Tasks of this committee are described below.

- To draft and issue basic policies, and where necessary, amendments to them, in connection with the Protection and Process of Personal data, to submit them for the approval of top management in order to give effect to them.
- To decide how to apply and audit the policies applicable to the Protection and Process of Personal data, and accordingly, to submit for the approval of top management regarding in-house appointments and assignments as well as internal coordination.
- To identify actions that need to be taken to ensure compliance with the Personal Data Protection Law and applicable legislation, and to submit those mandatory ones for the approval of top management; to supervise and coordinate their conduct.
- To raise awareness of the Company personnel and business partners regarding the protection and process of Personal Data.
- To identify risks that may arise in the course of the Company’s data process and protection activities, to ensure necessary measures are adopted; to submit improvement recommendations for the approval of the top management;
- To design and provide training courses regarding the protection of personal data and the implementation of policies.

- To decide the applications of personal data owners at the highest level;
- To coordinate information supply and training activities to ensure that personal data owners are informed about personal data process activities and their legal rights.
- To keep track of and monitor developments and regulations for the Protection of Personal Data; to make recommendations to the top management about actions that need to be taken by the Company in line with such developments and regulations.
- To coordinate relations with the Personal Data Protection Committee and Agency.
- To carry out other tasks that may be assigned by the Company's top management for the protection of personal data.

ANNEX 1- DEFINITIONS

Explicit Consent:	means freely given specific and informed consent about a specific matter or issue.
Anonymization :	means the irrevocable modification and alteration of personal data at the end of which it will lose its personal data nature For example: Transforming a personal data, by means of masking, aggregating or data destruction etc and similar techniques, to such manner that it can be no more associated with a natural person;
Employee Candidate:	means an individual who applies to our Company for job through any means or submits his resume and relevant details for the examination of our Company.
Employees, Shareholders and Officers of Entities with whom : we are in cooperation:	mean individuals or natural persons, including employees, shareholders or officers at such entities with which our Company engages any business relation (including but not limited to business partners and suppliers).
Process of Personal Data:	means any and all processes involving personal data whereby they are automatically, or provided to be a part of any data record system, manually (non-automatically) captured, recorded, logged, stored, kept, modified, edited, reworded, explained, taken over, turned into available for, classified or blocked from use in part or in full.
Personal Data Owner:	A natural person whose personal data are processed.
Personal Data:	Any and all information of such natural person whose identity is verified or verifiable; In light of the definition above, processing information of legal entities is not covered by this Law. For example: name and surname, Turkish Republic ID Number, e-mail, address, birth place, credit card number, bank account number etc.
Customer:	means such natural persons who have used or use products and services offered by our Company without regard to whether there is a contractual relation with our Company.
Special Categories of Personal Data/Sensitive Data:	Sensitive data include information about race, ethnical origin, political beliefs, philosophical beliefs, religion and faith, sects or other beliefs, clothing and attire, membership to foundations, unions or societies, health, sex life, criminal conviction and sentence, security measures as well as biometric and genetic data.

Potential Customer	means a natural person who displays in interests or makes a request to use our products and services or who is deemed to have such interest based on evaluations in line with commercial customs and rules of integrity;
Company Shareholder	means a natural person who is a shareholder of our Company.
Company Officer	means a member of our Company's board of directors or any other authorized natural person.
Third Party	means an individual to be in relation with such above-mentioned parties to ensure business operation security between them and our Company or to protect their rights or to ensure their interest and benefits (for instance, surety, guarantor, companion, family member and next of kin).
Data Processor:	means such natural or legal person that processes personal data on behalf of the data controller in reliance on such authorization given by the controller; For instance, cloud computing company that stores our data, poll takers who make customers sign forms, call-centres making outbound calls in line with instructions <i>etc.</i>
Data Controller:	means such person who sets and defines the purpose and means to process personal data and who manages such site where data are systematically kept (data record system).
Visitor	means an individual who visits our web site or visits our physical stores for various purposes.

ANNEX 2 ABBREVIATIONS

Law no 6698:	The Law no 6698 for the Protection of Personal Data which was enacted on 24 March 2016 and which was published in the Official Gazette issued on 7 April 2016 under no 29677
EU	European Union
The Constitution:	Turkish Republic Constitution adopted on 7 November 1982 under no 2709 as published in the Official Gazette issued on 9 November 1982 under no 17863.
PDP Committee	Personal Data Protection Committee
PDP Agency	Personal Data Protection Agency
Policy	Personal Data Protection and Process Policy of Arçelik-LG Klima Sanayi ve Ticaret A.Ş.
Company	Arçelik-LG Klima Sanayi ve Ticaret A.Ş.
Turkish Code of Obligations:	Turkish Code of Obligations adopted on 11 January 2011 under no 6098 as published in the Official Gazette issued on 4 February 2011 under no 27836;
Turkish Criminal Code:	Turkish Criminal Code adopted on 26 September 2004 under no 5237 as published in the Official Gazette issued on 12 October 2004 under no 25611;
Turkish Commercial Code :	Turkish Commercial Code adopted on 13 January 2011 under no 6102 as published in the Official Gazette issued on 14 February 2011 under no 27846.

ANNEX -3 DATES THAT ARE SIGNIFICANT FOR THE ENFORCEMENT AND APPLICATION OF PDP LAW

7 April 2016	<p>As of 7 April 2016, our Company acts in line with the following obligations:</p> <ul style="list-style-type: none"> (i) General rules and principles applicable to the process of personal data; (ii) Obligations to inform the personal data owners; (iii) Obligations to ensure the data security;
7 October 2016	<p>Following regulations shall be introduced as of 7 October 2016 and our Company shall act in full compliance with them:</p> <ul style="list-style-type: none"> (iv) Provisions applicable to the transfer of personal data to third parties and abroad; (v) Regulations that allow personal data owner to exercise his rights upon his application to our Company (to be informed whether or not his personal data are processed, information inquiry, to know about those persons to which information is transferred, requests for correction) and to file complaints with PDP Committee.
7 April 2017	<ul style="list-style-type: none"> (vi) Consents that were lawfully collected before 7 April 2016 shall be deemed to be in compliance with the PDP Law unless the personal data owner makes an otherwise statement as of 7 April 2017. (vii) As of 7 April 2017, Official Regulations in connection with the PDP Law shall become effective and our Company shall act in line with them.
7 April 2018	<p>Personal data that were processed before 7 April 2016 shall either be harmonized by our Company with the PDP Law or shall be either deleted or anonymized until 7 April 2018.</p>

ANNEX 4 PROCESS OF PERSONAL DATA OF EMPLOYEE CANDIDATES AND EMPLOYEES OF BUSINESS PARTNERS

PERSONAL DATA OWNER	COLLECTION AND PROCESS OF PERSONAL DATA	EXERCISE OF RIGHTS AND APPLICATIONS
Employee Candidates	<p>Personal data of the employee candidates that are collected during the recruitment process as well as any sensitive data of them collected based on the nature of the job are processed by our Company for the fulfilment of activities set and defined in our Human Resources Policy, for recruitment purposes and other purposes defined herein in addition to the following ones:</p> <ul style="list-style-type: none"> • To evaluate the candidate's qualifications, experience and interest and his suitability for the open position; • Where necessary, to verify the information provided by the candidate or to make investigations about the candidate by contacting third parties; • To contact the candidate about his application or recruitment process, or if appropriate, to subsequently contact the candidate for any position in Turkey or abroad; • To fulfil requirements of applicable law or to meet the demands by competent authorities or entities; • To develop and improve recruitment principles applicable by our Company. <p>Personal data of employee candidates may be collected by means of following methods and means:</p> <ul style="list-style-type: none"> • Written application form or digital application form published online; • Resumes delivered by the candidates to our Company via e-mail, cargo, reference or similar methods. 	<p>As it is also a personal data owner, an employee candidate may communicate his requests arising from his such status to our Company via the methods described in Section 2.2 of this Policy.</p>

	<ul style="list-style-type: none"> • Career or consultancy companies; • During interviews or talks by means of video conference or telephone; • Controls undertaken to verify the information provided by the candidate as well as our Company's inquiries, • Recruitment tests performed by experienced experts the outcome and results of which are examined to identify talents, skills and personal traits. 	
Employees of Business Partners	In connection with the performance of commercial operations between our Company and its business partners, our Company may process personal data of the employees of business partners based on the implementation of our Company's Human Resources policy in order to fulfil purposes set out in this Policy, including, in particular, the objective to ensure the commercial or legal security of our Company and those persons that we are cooperating.	As it is also a personal data owner, an employee candidate may communicate his requests arising from his such status to our Company via the methods described in Section 2.2 of this Policy.